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INTERVENTION

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Arizona Corporation Commission
BEFORE THE ARIZONA CORPORATION COMMISSION

DOCKETED

2002 JUN 14 P 4:02

WILLIAMS A. MUNDELL
Chairman
JUN 14 2002
JIM IRVIN
Commissioner
MARC SPITZER
Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

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IN THE MATTER OF THE GENERIC PROCEEDINGS CONCERNING ELECTRIC RESTRUCTURING ISSUES.

Docket No. E-00000A-02-0051

IN THE MATTER OF ARIZONA PUBLIC SERVICE COMPANY'S REQUEST FOR VARIANCE OF CERTAIN REQUIREMENTS OF A.A.C. R14-2-1606.

Docket No. E-01345A-01-0822

IN THE MATTER OF THE GENERIC PROCEEDING CONCERNING THE ARIZONA INDEPENDENT SCHEDULING ADMINISTRATOR.

Docket No. E-00000A-01-0630

IN THE MATTER OF TUCSON ELECTRIC POWER COMPANY'S APPLICATION FOR A VARIANCE OF CERTAIN ELECTRIC COMPETITION RULES COMPLIANCE DATES.

Docket No. E-01933A-02-0069

IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS STRANDED COST RECOVERY.

Docket No. E-01933A-98-0471

MOTION TO INTERVENE

AES New Energy, Inc. ("AES NE"), pursuant to A.A.C. R14-3-105, hereby moves to intervene in the above-captioned proceeding. In support hereof, AES NE states as follows:

1. AES NE holds a certificate of convenience and necessity to provide competitive services as an electric services provider. AES NE is a wholly-owned subsidiary of the AES Corporation, a leading global power company comprised of competitive generation, distribution and retail businesses around the world.

JONES, SKELTON & HOCHULL, P.L.C.
ATTORNEYS AT LAW
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2. AES NE seeks to participate in these proceedings because the issues being resolved here will affect whether electric competition is viable in Arizona. These proceedings therefore directly affect AES NE's financial interest in providing competitive electric services.

3. AES NE's participation in this proceeding will not unduly broaden the nature or scope of this proceeding.

4. No other party or intervenor can represent the interests of AES NE.

5. Service of all correspondence, documents or pleadings should be made to counsel for AES NE as follows:

Daniel W. Douglass
Law Offices of Daniel W. Douglass
5959 Topanga Canyon Blvd., Suite 244
Woodland Hills, CA 91367-7313

and

Randall H. Warner
Jones Skelton & Hochuli, PLC
2901 N. Central Avenue, Suite 800
Phoenix, Arizona 85012

6. AES NE only determined that intervention was necessary when it reviewed the testimony of Tucson Electric Power Company's witnesses. Because it believes the position advocated by TEP's witnesses would be detrimental to competition, it has file rebuttal testimony and requests leave to intervene.

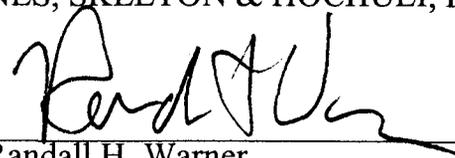
WHEREFORE, for the foregoing reasons, AES NE respectfully requests that the Commission issue its order granting this Motion to Intervene.

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RESPECTFULLY SUBMITTED this 14th day of June, 2002.

JONES, SKELTON & HOCHULI, P.L.C.

By 
Randall H. Warner
2901 North Central Avenue, Suite 800
Phoenix, Arizona 85012

and

Daniel W. Douglass
Law Offices of Daniel W. Douglass
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Attorneys for AES New Energy, Inc.

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- 1 ORIGINAL and 10 COPIES filed
- 2 this 14th day of June, 2002, with:
- 3 Docket Control
- 4 Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
- 5 COPY of the foregoing delivered
- 6 this 14th day of June, 2002, to:
- 7 Lyn Farmer
- 8 Chief Administrative Law Judge
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
- 9 Christopher Kempley
- 10 Chief Counsel
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
- 11 Ernest G. Johnson
- 12 Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
- 13 COPY of the foregoing mailed
- 14 this 14th day of June, 2002, to:
- 15 All parties in ACC Docket
- 16 No. E-0000A-02-0051
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- 19 M. Jauer
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